

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTOR, INC., TEAM AUTO SALES LLC., ROBERT ANTHONY URRUTIA, 189 SUNRISE HIGHWAY AUTO, LLC., NORTHSHORE MOTOR LEASING, LLC., BRIAN CHABRIER, individually and derivatively as member of NORTHSHORE MOTOR LEASING, LLC., JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC., JORY BARON, 1581 HYLAN BLVD AUTO, LLC., 1580 HYLAN BLVD AUTO, LLC., 1591 HYLAND BLVD AUTO, LLC., 1632 HYLAN BLVD AUTO, LLC., 1239 HYLAN BLVD AUTO, LLC., 2519 HYLAND BLVD AUTO, LLC., 76 FISK STREET REALTY, LLC., 446 ROUTE 23 AUTO, LLC., and ISLAND AUTO MANAGEMENT, LLC.,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC, INC., GOLD COAST CARS OF SYOSSET, LLC., GOLD COAST CARS OF SUNRISE, LLC., GOLD COAST MOTORS AUTOMOTIVE GROUP, LLC., GOLD COAST MOTORS OF LIC, LLC., GOLD COAST MOTORS OF ROSLYN, LLC., GOLD COAST MOTORS OF SMITHTOWN, LLC., UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS, INC., JONES, LITTLE & Co., CPA'S, LLP., FLUSHING BANK, and LIBERTAS FUNDING, LLC.,

Defendants.

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Case No. 2:23-cv-6188
(JMW)

**DECLARATION OF
ANTHONY DEO
IN REPLY**

Anthony Deo declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

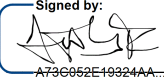
1. I respectfully submit this Declaration in Reply of the Deo Defendants' motion to modify the terms of the injunction and hold the Plaintiffs in contempt. I have personal knowledge of the facts set forth herein.

2. I am advised that one of the reasons that Plaintiffs have objected to the relocation of the six vehicles is because they assert that the vehicles will not be protected because the parking lot at Gold Coast Motors of Syosset, LLC (“GCM”) is a shared parking lot.

3. GCM has parking spaces exclusively allocated for the dealership’s use and they are marked accordingly. The six vehicles will be parked in spaces designated exclusively for GCM’s use and are only surrounded by other GCM designated spaces. This eliminates any risk of damage to the vehicles arising from the other commercial tenant’s visitors coming and going. Moreover, the parking lot is under 24-hour video surveillance.

4. For these reasons, I respectfully request that the Court grant the Deo Defendants’ letter motion.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 25, 2024.

Signed by:

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Anthony Deo